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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MEI-FANG LISA ZHANG, BAY AREA
AFFORDABLE HOUSING, LLC, XUE-
HUAN GAO, YANG-CHUN ZHANG,
CAROL JIAN DENG, and HAO LIANG,

Plaintiffs,

vs.

WEI-MAN RAYMOND TSE, RUN PING
ZHOU a.k.a. FLORA ZHOU, THERESA
WONG, JAMES YU, BILL SHU WAI MA,
MOLLY LAU, VICTOR SO, JIAN XIAO,
CHRIST INVESTMENT SERVICE INC., CIS
SERVICE, INC., PACIFIC BEST GROUP
LTD. a.k.a. PACIFIC BEST COMPANY
LTD., and SOUTH CHINA INVESTMENT
INC.,

Defendants.

Case No.: C-07-04946 JSW
(Related to C-05-02641 JSW)

**DECLARATION OF STEPHEN S. WU
SUPPORTING ADMINISTRATIVE
MOTION FOR LEAVE TO ISSUE
SUBPOENAS AND MOTION FOR
EXTENSION OF TIME TO SERVE
COMPLAINT**

I, Stephen S. Wu, declare:

1. I am one of the attorneys for Plaintiffs in this action. I make this declaration in support of Plaintiffs' Administrative Motion for Leave to Issue Subpoenas and Motion for Extension of Time to Serve Complaint.

- 1 -

DECLARATION OF STEPHEN S. WU SUPPORTING ADMINISTRATIVE MOTION FOR LEAVE
TO ISSUE SUBPOENAS AND MOTION FOR EXTENSION OF TIME TO SERVE COMPLAINT

Case No.: C-07-04946 JSW

1 2. Plaintiffs filed their Complaint on September 24, 2007. Since then, Plaintiffs
2 have sought diligently to serve all of the Defendants.

3 3. Plaintiffs have hired a process server company and a private detective in an effort
4 to complete service on all Defendants. On September 27, 2007, the private detective, Glen
5 Alberigi, served Wei-Man Raymond Tse in the lobby of 555 Montgomery Street in San
6 Francisco, by handing him the Summons, Complaint, and other suit papers. Mr. Tse attempted
7 to refuse the papers, but Mr. Alberigi put the papers under Mr. Tse's right arm, and walked
8 away. (*See* Declaration of Personal Service of Glen Alberigi at 1 (Docket No. 6).) According to
9 Mr. Alberigi, Mr. Tse then dropped the documents on the floor, in a fruitless attempt to avoid
10 service. (*See* Declaration of Christopher Cooke Regarding Service on Wei-Man "Raymond Tse"
11 at 3 (Docket No. 7).)

12 4. Plaintiffs have reported to me that after service of the Summons and Complaint,
13 the other individual Defendants stopped coming into the office at 555 Montgomery Street,
14 including Theresa Wong and James Yu.

15 5. The process server company, Specialized Legal Services, Inc. ("Specialized"),
16 was able to serve Defendant Jian Xiao at his home on October 1, 2007.

17 6. It was necessary to track down Defendant Victor So at the Legendary Palace, a
18 restaurant that he frequents, in order to serve him there. Service was completed by Specialized
19 on October 5, 2007.

20 7. Specialized served Defendant Molly Lau through a co-occupant of her home on
21 October 10, 2007.

22 8. Specialized attempted to serve Defendants Bill Shu Wai Ma, Christ Investment
23 Service Inc., and CIS Service Inc. from September through November 2007 at his home. Mr.
24 Ma is the registered agent for service of process for Christ Investment Service Inc., and CIS
25 Service Inc. A Specialized representative, Martin Horwitz, told me that the Specialized process
26 servers were having trouble completing the service. On September 25, 2007, a man at Mr. Ma's
27 address and fitting the description of Mr. Ma refused to receive the documents and denied being
28 Mr. Ma, stating his name was "Dick Wong." On 12 other occasions, the Specialized Process

1 Servers found no one at home. Finally, on December 2, 2007, a woman answered the door, who
2 refused to give her identity, but took the papers from the Specialized process server, and
3 Specialized mailed the documents to Mr. Ma after having left them with his co-occupant.

4 9. Mr. Horwitz told me that despite frequent visits to Defendants' offices at 555
5 Montgomery Street and the address in the Secretary of State's records for South China
6 Investment Inc. ("South China"), Specialized process servers were unable to find Defendants
7 Theresa Wong, James Yu, or Run Ping Zhou, the registered agent for service of process for
8 South China, or serve anyone at Defendants' offices who would be willing to take the suit
9 papers.

10 10. When Plaintiffs found the whereabouts of Run Ping Zhou, a second process
11 server company, Guaranteed Subpoena Service, Inc. ("Guaranteed"), handed the suit papers to
12 Ms. Zhou at her home in Cameron Park. Guaranteed reported to me, however, that Ms. Zhou
13 denied that she is the person known as Flora Zhou, an alias that she has used in the past. Service
14 was completed on December 7, 2007.

15 11. The private detective's attempts to track down Ms. Wong have not been
16 successful to date. Plaintiffs reported that Ms. Wong has made two trips out of the country since
17 Mr. Tse was served, and that she is currently out of the county.

18 12. Plaintiffs believe that Mr. Yu works at the California Department of Motor
19 Vehicles ("DMV"), but the DMV will not give counsel Mr. Yu's contact information without a
20 subpoena.

21 13. In summary, as of the date of this Declaration, Plaintiffs have served and filed
22 returns of service for the following defendants: Wei-Man Raymond Tse, Run Ping Zhou a.k.a.
23 Flora Zhou, Bill Shu Wai Ma, Molly Lau, Victor So, Jian Xiao, Christ Investment Service Inc.,
24 CIS Service Inc., and South China Investment Inc. They are preparing a return of service for
25 Pacific Best Group Ltd. a.k.a. Pacific Best Company Ltd. based on service on Mr. Tse and the
26 fact that he is the general manager of the company.

27 14. The only remaining unserved defendants are Theresa Wong and James Yu.
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